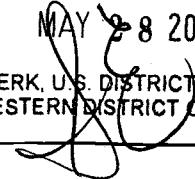


**SEALED**

UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
MIDLAND-ODESSA DIVISION

**FILED**

MAY 28 2014  
CLERK, U.S. DISTRICT COURT  
WESTERN DISTRICT OF TEXAS  
BY   
DEPUTY

UNITED STATES OF AMERICA,

Plaintiff,

v.

(1) SHONDA TENNILLE CROSSON  
(2) JOSHUA LYNN MERRITT  
(3) PHILLIP RAY POWELL  
(4) ANGELEE DANIELLE DANIELS

Defendants.

CRIMINAL NO.

INDICTMENT

[Vio: Ct 1 - 21 U.S.C. § 846 -  
Conspiracy;  
Ct. 2 - 21 U.S.C. § 841(a)(1)-  
Possession With Intent to  
Distribute a Controlled  
Substance and 18 U.S.C. 2]

**MO14CR0136**

**THE GRAND JURY CHARGES:**

**COUNT ONE**  
[21 U.S.C. § 846]

Beginning on or about June of 2013 and continuing until the date of this indictment, in the Western District of Texas and elsewhere, the Defendants,

**SHONDA TENNILLE CROSSON  
JOSHUA LYNN MERRITT  
PHILLIP RAY POWELL  
AND  
ANGELEE DANIELLE DANIELS,**

did combine, conspire, confederate and agree together and with each other, SEAN NIECE (indicted elsewhere) and with others known and unknown to the Grand Jury, to possess with intent to distribute and distribute a controlled substance, which offense involved five grams or more of actual methamphetamine, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), in violation of Title 21, United States Code, Section 846.

**COUNT TWO**  
[21 U.S.C. § 841(b)(1)(C)]

On or about March 6, 2014 in the Western District of Texas and elsewhere, the Defendants,

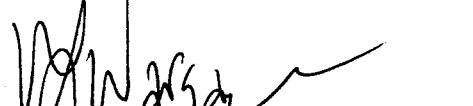
**SHONDA TENNILLE CROSSON  
JOSHUA LYNN MERRITT  
PHILLIP RAY POWELL  
AND  
ANGELEE DANIELLE DANIELS,**

aided and abetted by each other, by SEAN NIECE (indicted elsewhere) and by others known and unknown to the Grand Jurors did unlawfully, knowingly and intentionally possess with intent to distribute and distribute a controlled substance, which offense involved five grams or more of actual methamphetamine, contrary to Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(B), in violation of Title 18, United States Code, Section 2.

A TRUE BILL.

*Original signed by the  
foreperson of the Grand Jury*  
\_\_\_\_\_  
FOREPERSON OF THE GRAND JURY

ROBERT PITMAN  
UNITED STATES ATTORNEY

  
\_\_\_\_\_  
V. LATAWN WARSAW  
Assistant United States Attorney

**SEALED**PERSONAL DATA SHEET (REDACTED)  
UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

SEALED		
COUNTY: Midland/Odessa	DIVISION: MIDLAND/ODESSA	JUDGE: Junell
DATE: May 28, 2014	MAG CT #:	FBI #:
CASE NO: MO-14-CR-	ASSISTANT U.S. ATTORNEY: LATAWN WARSAW	
DEFENDANT: 1. SHONDA TENNILLE CROSSON		DOB: XXXXXXXX
ADDRESS: XXXXXXXXXXXXXXXXXXXXXXXXX		
CITIZENSHIP: INTERPRETER NEEDED LANGUAGE:		
DEFENSE ATTORNEY: EMPLOYED APPOINTED		
DEFENDANT IS: Not Arrested		
DATE OF ARREST:	BENCH WARRANT: XXX	
PROBATION OFFICER:		
NAME AND ADDRESS OF SURETY:		
YOUTH CORRECTIONS ACT APPLICABLE: No		
PROSECUTION BY: Indictment		
OFFENSE (Code and Description): Ct. 1 & 2 - 21 USC 846 - Conspiracy; 21 U.S.C. § 841(a)(1) - Possession with intent to distribute.		
OFFENSE IS: FELONY		
MAXIMUM SENTENCE: Ct. 1 and 2 - A 5 year minimum mandatory term of imprisonment up to 40 years; a 4 year minimum mandatory term of supervised release; a fine not to exceed \$5 million; and a mandatory \$100 special assessment.		
PENALTY IS MANDATORY: As stated above.		
REMARKS: AGENT: Brian Hutchison, Drug Enforcement Administration		

**SEALED**PERSONAL DATA SHEET (REDACTED)  
UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

SEALED		
COUNTY: Midland/Odessa	DIVISION: MIDLAND/ODESSA	JUDGE: Junell
DATE: May 28, 2014	MAG CT #:	FBI #:
CASE NO: MO-14-CR-	ASSISTANT U.S. ATTORNEY: LATAWN WARSAW	
DEFENDANT: 2. JOSHUA LYNN MERRITT	DOB: XXXXXXXX	
ADDRESS: XXXXXXXXXXXXXXXXXXXXXXX		
CITIZENSHIP: INTERPRETER NEEDED LANGUAGE:		
DEFENSE ATTORNEY: EMPLOYED APPOINTED		
DEFENDANT IS: Not Arrested		
DATE OF ARREST:	BENCH WARRANT: XXX	
PROBATION OFFICER:		
NAME AND ADDRESS OF SURETY:		
YOUTH CORRECTIONS ACT APPLICABLE: No		
PROSECUTION BY: Indictment		
OFFENSE (Code and Description): Ct. 1 & 2 - 21 USC 846 - Conspiracy; 21 U.S.C. § 841(a)(1) - Possession with intent to distribute.		
OFFENSE IS: FELONY		
MAXIMUM SENTENCE: Ct. 1 and 2 - A 5 year minimum mandatory term of imprisonment up to 40 years; a 4 year minimum mandatory term of supervised release; a fine not to exceed \$5 million; and a mandatory \$100 special assessment.		
PENALTY IS MANDATORY: As stated above.		
REMARKS: AGENT: Brian Hutchison, Drug Enforcement Administration		

**SEALED**PERSONAL DATA SHEET (REDACTED)  
UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

SEALED		
COUNTY: Midland/Odessa	DIVISION: MIDLAND/ODESSA	JUDGE: Junell
DATE: May 28, 2014	MAG CT #:	FBI #:
CASE NO: MO-14-CR-	ASSISTANT U.S. ATTORNEY: LATAWN WARSAW	
DEFENDANT: 3. PHILLIP RAY POWELL		DOB: XXXXXXXX
ADDRESS: XXXXXXXXXXXXXXXXXXXXXXX		
CITIZENSHIP: INTERPRETER NEEDED LANGUAGE:		
DEFENSE ATTORNEY: EMPLOYED APPOINTED		
DEFENDANT IS: Not Arrested		
DATE OF ARREST:	BENCH WARRANT: XXX	
PROBATION OFFICER:		
NAME AND ADDRESS OF SURETY:		
YOUTH CORRECTIONS ACT APPLICABLE: No		
PROSECUTION BY: Indictment		
OFFENSE (Code and Description): Ct. 1 & 2 - 21 USC 846 - Conspiracy; 21 U.S.C. § 841(a)(1) - Possession with intent to distribute.		
OFFENSE IS: FELONY		
MAXIMUM SENTENCE: Ct. 1 and 2 - A 5 year minimum mandatory term of imprisonment up to 40 years; a 4 year minimum mandatory term of supervised release; a fine not to exceed \$5 million; and a mandatory \$100 special assessment.		
PENALTY IS MANDATORY: As stated above.		
REMARKS: AGENT: Brian Hutchison, Drug Enforcement Administration		

**SEALED**PERSONAL DATA SHEET (REDACTED)  
UNITED STATES DISTRICT COURT  
WESTERN DISTRICT OF TEXAS

SEALED		
COUNTY: Midland/Odessa	DIVISION: MIDLAND/ODESSA	JUDGE: Junell
DATE: May 28, 2014	MAG CT #:	FBI #:
CASE NO: MO-14-CR-	ASSISTANT U.S. ATTORNEY: LATAWN WARSAW	
DEFENDANT: 4. ANGELEE DANIELLE DANIELS		DOB: XXXXXXXX
ADDRESS: XXXXXXXXXXXXXXXXXXXXXXX		
CITIZENSHIP: INTERPRETER NEEDED LANGUAGE:		
DEFENSE ATTORNEY: EMPLOYED APPOINTED		
DEFENDANT IS: Not Arrested		
DATE OF ARREST:	BENCH WARRANT: XXX	
PROBATION OFFICER:		
NAME AND ADDRESS OF SURETY:		
YOUTH CORRECTIONS ACT APPLICABLE: No		
PROSECUTION BY: Indictment		
OFFENSE (Code and Description): Ct. 1 & 2 – 21 USC 846 - Conspiracy; 21 U.S.C. § 841(a)(1) - Possession with intent to distribute.		
OFFENSE IS: FELONY		
MAXIMUM SENTENCE: Ct. 1 and 2 - A 5 year minimum mandatory term of imprisonment up to 40 years; a 4 year minimum mandatory term of supervised release; a fine not to exceed \$5 million; and a mandatory \$100 special assessment.		
PENALTY IS MANDATORY: As stated above.		
REMARKS: AGENT: Brian Hutchison, Drug Enforcement Administration		